Milestone Schedule Nevada Environmental Response Trust (NERT) Site Henderson, NV Revised – July 15, 2011

I. On-Going Excavation/Backfill Program

- a. Develop Draft Site-Wide Risk Management Plan Mid-June, 2011 (Draft submitted on March 31, 2011; comments received from NDEP on April 19, 2011; revised draft submitted on June 10, 2011, currently developing Excavation Control Areas appendix discussed with NDEP at our May 24 meeting; interim draft of ECA Table and Map submitted to NDEP on June 24, 2011; Comments received from NDEP on July 14, 2011, revision currently in progress)
- **b.** Determination of Final Scope of Excavation/Backfill Program Mid-June, 2011
 - i. Develop Soil Sampling Program for Visually Impacted Soils (Submitted to NDEP on April 18, 2011; approval received from NDEP)
 - ii. Identify final Excavation Control Areas July 30, 2011 (ECAs were discussed at May 24 meeting with NDEP; final list of ECAs to be developed on final sampling results and included with Site Management Plan; interim draft of ECA Table and Map submitted to NDEP on June 24, 2011)
 - **iii.** Implement additional excavation and post-excavation sampling in RZ-E as discussed during NDEP site visit On-going
- **c.** Complete Excavation Program July 30, 2011 (Dependent on sampling results pursuant to Item b and actual volume of Visually Impacted soils that will require excavation)
- **d.** Complete Backfill/Grading Program Mid-September 2011 (*Dependent on completion of Item c*)
- e. Develop Draft Excavation Completion Report September 15, 2011
- **f.** Develop Final Excavation Completion Report October 15, 2011
- **g.** Request Site-Wide Institutional Control/Environmental Covenant April 30, 2011

II. Compliance Monitoring

- a. Conduct Annual Groundwater Monitoring Completed in May 2011
- b. Submit Annual Groundwater Compliance Monitoring Report August 31, 2011

III. Groundwater Remedy

a. Capture Zone Evaluation Report – May 10, 2011 Conference call scheduled

(Comments received from NDEP on April 5, 2011; Spoke with NDEP requesting a delay to after future discussions on RAOs and overall long-term strategy with respect to groundwater remedy; new RAOs currently under development and the need for CZE will be considered subsequently; ENVIRON requested SOW on July 11, 2011 from Northgate to finalize CZE Report)

- **b.** Response to NDEP Comments on LSSL Technical Memorandum Submitted to NDEP on May 9, 2011
- c. Develop Remedial Action Objectives (RAOs) August 31, 2011
 - i. Identify preliminary RAOs for consideration by NDEP Submitted to NDEP on April 27, 2011
 - **ii.** Revise preliminary RAOs June 24, 2011 (preliminary RAOs discussed at May 24 meeting with NDEP and revisions based on NDEP's comments have been incorporated into revised draft)
 - iii. Discussions with NDEP and Stakeholders to develop final RAOs August 1, 2011
- **d.** Conduct GWETS and Montoring Program Optimization Study September 30, 2011
 - i. Revise CZE as required for use in optimization study and to address NDEP comments August 15, 2011
 - ii. Develop technical memo August 30, 2011
 - **iii.** Finalize technical memo and implement optimization recommendations September 30, 2011
- **e.** Develop Technology Screening Report and Focused Feasibility Study Workplan December 15, 2011
 - i. Identify screened list of potentially feasible technologies that will meet RAOs and retained for analysis in FFS
 - ii. Identify additional bench or pilot studies required for FFS
 - iii. Submit draft report to NDEP November 1, 2011
- **f.** Complete Focused Feasibility Study March 31, 2013 (*draft report submittal date*)
 - i. Commence design and subcontracting of bench/pilot studies January 2012
 - ii. Implement bench/ pilot studies Mid 2012
 - iii. Complete bench/pilot studies for information relevant to FFS analyses March 2013
 - iv. Submit draft FFS to NDEP March 31, 2013

IV. Other

- a. Submit GW-11 Dam Permit Application Submitted to NDWR on May 9, 2011
- **b.** Complete Relocation of RZ-C Utility Line Completed
- **c.** Complete Subcontracting and Plan for AP-5 Remediation To be included in Site-Wide FS

- **d.** Response to NDEP Comments on January 28, 2011 DVSR Additional Preconfirmation Sampling Submitted to NDEP on April 14, 2011
- e. Tronox Stormwater Permitting (Discussed with NDEP DWR on May 9, 2011; June 7 meeting held with Tronox and neighboring property owners to discuss options; NDEP inspection on June 15, 2011; segregation of Timet Stormwaterto be completed week of July 18)